

Minnesota Tele-Media

Southwest Minnesota State University
1501 State Street
Marshall, MN 56258
Phone (507) 537-6984
Fax (507) 537-6095

October 20, 2008

To: The Secretary, FCC
Attention: The Commission

On behalf of the Minnesota Tele-Media Board of Directors (MTM), I am writing to express MTM's support for the comments filed by the National Education Broadband Services Association (NEBSA) on September 22, 2008 pursuant to WT Docket No. 03-66.

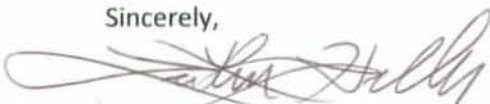
Specifically, MTM supports 1) the concept of maximizing existing EBS licensees' Geographic Service Areas (GSAs) espoused by NEBSA and 2) the process for allocating then remaining EBS white space licenses articulated by NEBSA. MTM also supports the supplemental proposals regarding secondary market excess capacity leases and substantial service rules.

MTM is an organization representing higher education and K-12 education entities in an eighteen county area of southwestern and west central Minnesota. The approximate population of this region is 280,000. MTM currently holds eight EBS license authorizations.

MTM believes that the "GSA Maximization Process" described by NEBSA will help speed the deployment of wireless broadband services in heavily rural areas like the geographic region we serve. This process will reduce the obstacles to widespread wireless broadband services deployment our telecommunications services partners may incur. These obstacles include increased costs they may face to develop systems that don't extend radio waves into any adjacent whitespace given future uncertainty regarding the licensing of such whitespace. As a result of such uncertainty, regions with low density population bases like southwestern and west central Minnesota may get limited geographic coverage as financial incentives for deploying systems with larger coverage areas will not be present for our partners.

MTM is also supportive of the "Open Application Process" for remaining white space spectrum following the proposed "GSA Maximization Process". While it is apparent from NEBSA's analysis that no BTA-Wide white space spectrum would be available in MTM's service area, such an Open Application Process would be the most reasonable licensing process to allow widespread participation by educational entities.

Sincerely,



Luther Heller
Chairperson